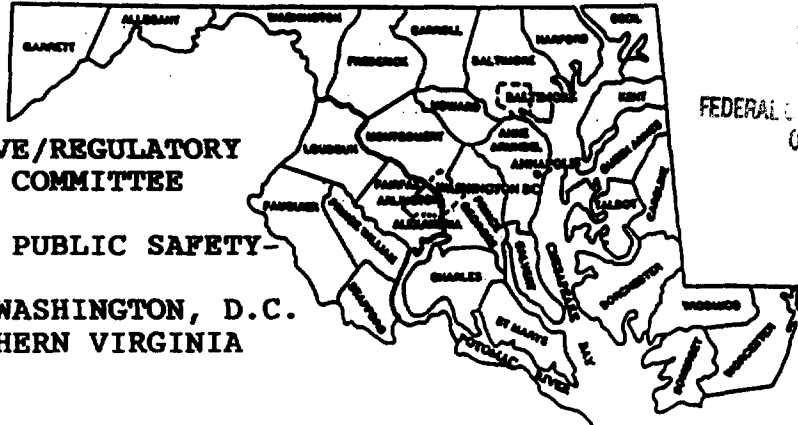


ORIGINAL

RECEIVED

OCT 21 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY



LEGISLATIVE/REGULATORY
AFFAIRS COMMITTEE

-REGION-20 PUBLIC SAFETY-

MARYLAND, WASHINGTON, D.C.
AND NORTHERN VIRGINIA

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

In the Matter of)
)
The Development of Operational,)
Technical, and Spectrum)
Requirements for Meeting)
Federal, State and Local Public)
Safety Agency Communications)
Requirements Through the)
Year 2010)

WT Docket No. 96-86

COMMENTS

Submitted by:

Region-20 Public Safety Review Committee
Legislative/Regulatory Affairs Committee
Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

October 21, 1996

No. of Copies rec'd
List A B C D E

024



PRESIDENT (CY '94)
ALEXANDRIA MEDICAL SOCIETY, INC.

CLINICAL INSTRUCTOR
GEORGETOWN UNIVERSITY SCHOOL OF MEDICINE

MICHAEL C. TRAHOS, D.O.
GENERAL MEDICINE/FAMILY PRACTICE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
The Development of Operational)
Technical, and Spectrum)
Requirements for Meeting)
Federal, State and Local Public)
Safety Agency Communications)
Requirements Through the)
Year 2010)

WT Docket No. 96-86

COMMENTS

Submitted by: Region-20 Public Safety Review Committee
Legislative/Regulatory Affairs Committee
Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

Date: October 21, 1996

I. INTRODUCTION

1. Before the Federal Communications Commission (Commission) is a NOTICE OF PROPOSED RULE MAKING (NOTICE) to address future Public-Safety communications needs. On October 9, 1996, the Commission released a PUBLIC NOTICE requesting

additional comments on the issue of creating a non-accredited standard-setting organization to address future interoperability communications issues.1/

2. Pursuant to the authority given by the Commission under the Report and Order in General Docket No. 87-112 2/, the Region-20 Public Safety Planning Committee was created to address the future communications needs and concerns of the PSRS users for Region-20. The obligations of that Committee included the submission to the Commission of a Region-20 Public Safety Radio Communications Plan (Region-20 Plan) 3/ and establishment of a Region-20 Public Safety Review Committee (Committee) to oversee its implementation.

3. This NOTICE has raised important issues. This Committee, representing the PSRS/governmental constituents for Region-20, hereby submits the following timely filed **COMMENTS** in response to this NOTICE, addressing those issues of most concern and their potential effects on the Region-20 Plan implementation process and/or constituency.

II.

COMMENTS

4. Since its creation, this Committee, through its membership, has been an active participant on the various subcommittees of the Public Safety Wireless Advisory Committee (PSWAC), including the PSWAC Interoperability Sub-Committee (ISC). It was the PSWAC/ISC that recommended an analog baseline technology for interoperability and a fair and open process for future interoperability standards development.

5. This Committee concurs with the creation of a Commission adopted Non-Accredited Standards-Setting Organization for the development of interoperability standards for public safety wireless communications equipment. This Committee further believes that the Commission utilization of the general principles articulated in Section 273(d)(4) 4/ of the Communications Act of 1934 (the Act) is appropriate.

6. Section 273(d)(4)(A)(ii) of the Act states that participation in a non-accredited standard-setting organization "shall be reasonable and nondiscriminatory" and shall not "unreasonably exclude any interested party."5/ This Committee recognizes that general open citizen participation may be impractical. However, this Committee would strongly recommend that participation in such an organization be extended to

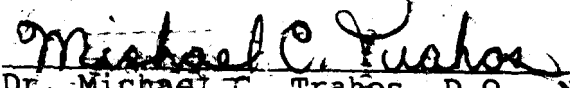
representative(s) of each Regional Public Safety Review Committee (RPRC) as created pursuant to the Report and Order in General Docket No. 87-112.6/ These RPRCs are representative of the Public Safety, Emergency Medical and Special Emergency entities within their regions. Their participation would be an invaluable asset to such an organization.

III.

CONCLUSION

7. For the reasons set forth supra, this Committee strongly recommends that the Regional RPRCs be allowed participation in a Commission sanctioned Non-Accredited Standards-Setting Organization for the development of future interoperability standards for public safety communications equipment. Their participation in such an organization would be invaluable and in the public interest.

Respectfully submitted,


Dr. Michael C. Trahos, D.O., NCE, CET
Chairman - Region-20 Legislative/
Regulatory Affairs Committee

IV.

FOOTNOTES

- 1/ PUBLIC NOTICE, WT Docket No. 96-86, FCC 96-403, October 9, 1996.
- 2/ REPORT AND ORDER, GN Docket No. 87-112, FCC 87-359, Paragraph 4.
- 3/ WASHINGTON, D.C. METROPOLITAN AREA - REGION 20, GN Docket No. 90-7, DA 90-28, January 17, 1990.
- 4/ 47 U.S.C. 273(d)(4).
- 5/ Ibid, subsection (A)(ii).
- 6/ REPORT AND ORDER, GN Docket No. 87-112, FCC 87-359.